

25.5 Meetings

The Council will meet a minimum of one time per year. Special meetings may be called by the Council Chair, as needed.

Working or standing committees by the Council may meet at additional times as determined by the committee and/or its Chair.

Subject to the conditions of ACLASS' conflict of interest policy and confidentiality statement, staff and other guests may attend Council meetings and may participate in the discussion of specific agenda items. Such guests may be invited by the Council Chair or the ex officio members. Guests may promote a particular view but may not take part in Council decisions.

ACLASS staff provides administrative support to the Council, including but not limited to preparing meeting agendas and exhibits, arranging meeting logistics, documenting Council actions, and maintaining Council records.

In addition to these meetings, the Council directs ACLASS management to establish and report metrics related to the assessor and/or expert approval process at each meeting. The established metrics shall be determined by ACLASS management. The Council may suggest metrics and/or require the use of specific metrics.

25.6 Interpretations

The Council may, from time to time, issue interpretations for any conformity assessment program for which ACLASS offers accreditation. A request for interpretation will normally originate from an ACLASS Council Member, the ACLASS Senior Accreditation Manager(s), an ACLASS assessor or a customer, but could originate from another source. All requests for interpretation will be directed to the ACLASS Senior Accreditation Manager(s) and/or the Vice President, who will decide whether to hold the request until the next Council meeting, or forward to all Council members for immediate consideration. The Council may decide to address the request for interpretation as a Council, or establish a technical committee and delegate the issue to the committee for resolution. Once the interpretation has been completed, the technical committee will present their recommendation to the Council for final review and approval. The Council will then provide the interpretation guidance to the Vice President.

25.7 Complaints and Appeals (Accreditation Council)

The Council or certain members may participate in an appeal and/or complaint in accordance with this document, Section 22.0.

25.8 Establishment of Committees

The Council may, from time to time, establish technical or other committees. Such committees will serve to interpret the accreditation process, interpret the requirements of

ACLASS' conformity assessment programs, develop requirements, and provide feedback to assessors and/or ACLASS, as necessary. Members of such committees shall be chosen from and represent those interests involved in the accreditation process without any single interest predominating. Each committee shall be represented by the appropriate expertise for which that committee was created. See also this document, Section 24.0, Personnel and Assessor Criteria and Training.

Members of any such committee shall be comprised of persons encompassing the appropriate technical competence and each member shall maintain impartiality and integrity.

Advice from appropriate, technically competent individuals and/or organizations may be used in lieu of or in addition to the creation of committees. Such advice that is derived from outside committees, organizations, and/or individuals may be used to interpret the requirements of ACLASS' conformity assessment programs, develop requirements, and provide feedback to assessors and/or ACLASS, as necessary.

25.9 Composition of Committees

Committee members shall be considered on the basis of their expertise, training, and/or overall knowledge for which the committee was created.

A committee shall not be less than one person. Committee members may vote amongst themselves to determine consensus in order to submit a report to the Council.

Members of the Council may serve on committees provided there is no conflict of interest for which the committee was created. The Council Chair and/or the Vice President may approve committee members who are not members of the Accreditation Council.

The Council may terminate any member's appointment with cause at any time. Notification of termination shall be in writing from the Council Chair. If the Council Chair's appointment is terminated, notification shall be in writing from the ACLASS Vice President.

26.0 Extension of Activities

Any move into other areas of conformity assessment activities will require an analysis of such extension. Should additional representation be necessary to be embodied on the Accreditation Council and/or Board of Directors, the Council/Board shall increase its members according to this document section 25.³⁹

26.1 Analysis of Extension

Top management will conduct a review of extending ACLASS' current accreditation activities on an as needed basis in response to the demands of interested parties. The review will consist of at least the following:

³⁹ Such increase in members shall also conform to the ANSI-ASQ National Accreditation Board By-Laws.

- ACLASS' present competence
- Appropriateness of the extension of accreditation activities
- Resources, etc.
- Training needs

If top management identifies a viable need for ACLASS to extend its accreditation activities, top management will identify appropriate expertise as well as identify access to such expertise to carry out the extension of ACLASS' accreditation activities.

Top management will seek out the appropriate expertise through external sources (i.e. government and private industry) if not already available and/or known to ACLASS.

Any necessary forms, documents, and/or guidance documents needed to carry out the extension of ACLASS' accreditation activities will be drafted according to this document section 21.0.

If top management identifies the need for additional assessors and the training of additional assessors, including ACLASS staff, in order to carry out the extension of ACLASS' accreditation activities, it will be done in accordance with this document section 24.0.

When training is necessary for ACLASS staff, assessors and/or experts for an extension into other accreditation activities, this training will be documented and become part of the record (see also section 24.11).

27.0 ACLASS ACCREDITATION ASSESSMENT CHECKLISTS

ACLASS maintains appropriate checklists that enumerate the requirements for each respective ACLASS conformity assessment program. ACLASS assessors will use each appropriate accreditation assessment checklist for each applicable conformity assessment program to assess and record a customer's compliance to ACLASS' accreditation requirements. Each applicable checklist is publicly available for applicant and accredited customers.

Additional requirements may be contained within each respective accreditation checklist in order to ensure compliance to sector specific requirements.⁴⁰

27.1 General Provisions and Quality System

Business, quality system and assessment policies are established in the Quality Manual, ACLASS Document 1.

⁴⁰ Customers may or may not choose to meet the requirements of any additional sector specific requirements such as but not limited to, ANSI Z-540-1 (Z-540.3), 1994 or FCC EMC requirements (or any future versions thereof). ACLASS will not hold the customer responsible for meeting any additional sector specific requirements (or any future versions thereof) if they so choose unless they claim compliance on their issued reports or have indicated to ACLASS a desire to meet such sector specific requirements.

27.2 Assessors and Experts

All assessors and experts shall be approved by ACLASS in accordance with this document, ACLASS Document 2, Section 24.

27.3 Accreditation Systems

The appropriate accreditation assessment checklists, ACLASS documents for each respective conformity assessment program, and this document, establish for the customer and assessment team the requirements for each respective ACLASS conformity assessment program accreditation.

27.4 Accreditation Processes

Each respective ACLASS accreditation assessment checklist shall be used in conjunction with this document, including each respective ACLASS document for each conformity assessment program, which provides assessors, experts and staff detailed instructions as to how to carry out the assessment process.

ILAC Guide 15 (and any future version thereof) is used to help facilitate consistent application and assessment of the requirements of the standard by accreditation bodies that operate in accordance with ISO/IEC 17011.

The ACLASS management information system database will contain all the current versions of documents, forms, and templates.

28.0 CERTIFICATE, SCOPE, LOGO AND SYMBOL

ACLASS controls the certificate, scope of accreditation and the use of the ACLASS logo and accreditation symbol with ACLASS procedures and as provided for in each respective application for accreditation. The customer may use the ACLASS accreditation symbol on letterhead, web sites, marketing documentation, calibration certificates, test reports, test certificates, etc. At no time or in any way may the customer use the symbol to indicate ACLASS approval of the results of its calibration(s) or test(s).

The customer shall ensure that the accreditation symbol is only used within the scope of the accreditation. ACLASS may withdraw a customer's accreditation certificate and the use of the accreditation symbol at any time for a customer's misuse of the symbol, or management system failures.⁴¹

28.1 Use of ACLASS Symbol

ACLASS maintains a logo used only by ACLASS. The ACLASS symbol, which is issued by ACLASS to accredited customers to indicate their accredited status, shall be used by accredited customers only (see also ACLASS guidance on symbol usage).

⁴¹ This also applies to misuse of the ILAC mark, pursuant to the sublicense agreement

ACLASS currently maintains six separate symbols: one for calibration customers, one for testing customers, one for dual calibration and testing customers, one for reference material producers, one for proficiency testing providers and one for inspection bodies.

A company accredited by ACLASS may use the ACLASS symbol as follows and in accordance with the application for accreditation. The application for accreditation provides explicit information concerning the use of the ACLASS symbol:

- The ACLASS symbol may be used on a Company's literature, such as: Letter Headings, Business Cards, Brochures, Advertising and Marketing Materials. The ACLASS symbol may be used on a Company's web site.
- The ACLASS symbol may only be used within the scope of the Company's Accreditation.
- Any size is acceptable but all associated text shall be legible.
- The acceptable colors for the ACLASS symbol are:
 - Blue – PMS 2935
 - Black and white is also acceptable

The ACLASS Symbol may not be used as follows:

- the symbol shall not be used by a customer's subcontractor which is not accredited
- the symbol shall not be used by applicants for accreditation
- the symbol shall not be used by an accredited organization under a different name in which it holds accreditation

28.2 ACLASS Symbol Enforcement

All customers that have their accreditation suspended, reduced, and/or withdrawn, shall discontinue use of the ACLASS symbol upon written notification and in accordance with ACLASS requirements. Suspended or withdrawn customers, upon suspension or withdrawal, must remove any use of the ACLASS symbol and reference to their certificate and scope of accreditation within 30 days from notification.⁴²

All suspended and withdrawn customers will have their website reviewed for compliance of removal within the specified timeframe. If it is found that the customer is not in compliance with removal, ACLASS shall issue a follow-up letter as well as post the customer in question on our website indicating that the customer is issuing false claims of accreditation.

⁴² Customers that have specific accredited activities suspended, reduced, and/or withdrawn shall discontinue use of the ACLASS symbol upon written notification and in accordance with the ACLASS requirements for that specific activity only. This also applies to use of the ILAC mark, pursuant to the sublicense agreement.

All active customers will have their website periodically reviewed for compliance for use of the ACLASS symbol. If it is found that the customer is not in compliance with use of the ACLASS symbol, ACLASS shall notify the customer and inform them of the proper use of the ACLASS symbol and provide the customer with a specified timeframe to become compliant.

ACLASS will make every effort to enforce the use of the ACLASS symbol and upon written notice to the Customer shall have the right to:

- Suspend its accreditation activities until customer complies with its obligation
- Determine that customer is no longer entitled to identify itself as accredited by ACLASS
- Require customer (temporarily or permanently) to cease using in any manner the certificate and scope of accreditation (and to return such certificate and scope), and the ACLASS symbol
- Refuse to issue a certificate and scope of accreditation to customer
- Require a corrective action
- Publish customer's transgression
- Take other legal action

In the event ACLASS takes any of the foregoing actions, ACLASS shall not be required to reimburse any amounts to customer.

28.2 Use of the ILAC Mark (ILAC Sub-License Agreement)

ACLASS has entered into a license agreement with the International Laboratory Accreditation Cooperation (ILAC) for the use of the Combined MRA Mark. ACLASS accredited organizations are entitled to use the Combined MRA Mark together with the certificate number of the accredited organization, hereinafter "Combined MRA Mark."

ACLASS accredited organizations wishing to use the Combined MRA Mark shall enter into and sign a sub-license agreement.

Pursuant to ACLASS' policies and procedures and the terms set-forth in the ILAC Combined MRA Mark Sub License Agreement, an ACLASS accredited organization may use the Combined MRA Mark on test reports, calibration certificates, pre-printed letterhead, quotations for work, advertisements, websites and other documents in order to demonstrate accreditation by ACLASS, which is a signatory to the ILAC Arrangement.

28.2.1 Applying for Use of the Combined Mark

Accredited ACLASS customers may request to use the Combined MRA Mark by submitting a written request to ACLASS. Upon receipt of the written request, ACLASS will send to accredited organizations the ILAC Combined MRA Mark Sub License Agreement.

The accredited organization must sign the sub license agreement and return it to ACLASS along with an example of how the combined mark will be used according to the terms of the ILAC Combined MRA Mark Sub License Agreement and ACLASS policies and procedures.

ACLASS will then send to the accredited organization written approval confirming authorization for use of the Combined MRA Mark.

28.2.2 Combined Mark Guidelines

Pursuant to ACLASS' policies and procedures and the terms set-forth in the ILAC Combined MRA Mark Sub License Agreement, an ACLASS accredited organization may use the Combined MRA Mark on test reports, calibration certificates, pre-printed letterhead, quotations for work, advertisements, websites and other documents in order to demonstrate accreditation by ACLASS, which is a signatory to the ILAC Arrangement.

The Combined MRA Mark shall be used according to the example provided for within the sub license agreement using the same proportions. As a general guideline the ACLASS symbol should be within approximately 5% of the size of the ILAC MRA Mark, to ensure that the overall symmetry of the design and the relative proportions are maintained.

The ILAC-MRA Mark is available in a variety of formats and these can be obtained from ACLASS after signing the ILAC sub license agreement.

28.2.3 Requirements, Rights and Duties

The sub license agreement sets forth the extent of the license of the Combined MRA Mark.

All ACLASS accredited organizations are obliged to present its Combined MRA Mark to ACLASS for review and approval and shall not use it until receipt of written approval has been received from ACLASS.

All ACLASS accredited organizations guarantee to use the Combined MRA Mark in accordance with the requirements set forth in ACLASS' policies and procedures and the ILAC Combined MRA Mark Sub License Agreement, and

- Shall not use the Combined MRA Mark in any way that would harm the reputation of ILAC and/or ACLASS
- Shall allow ACLASS to observe the use of the Combined MRA Mark
- Shall sign the ILAC Combined MRA Mark Sub License Agreement, if wanting to use the combined mark

ACLASS may withdraw immediately the right to use the Combined MRA Mark if ACLASS determines Improper Use (see also Symbol Enforcement). ACLASS assumes no responsibility for any consequences of withdrawal. Terms of use are conveyed in the ILAC Combined MRA Mark Sub License Agreement and the ACLASS policies and procedures.

29.0 ACLASS MRA/MLA OBLIGATIONS

ACLASS will honor and enforce the requirements of each respective MRA and/or MLA for which ACLASS is a signatory, including but not limited to:

- The use of equivalent procedures in the accreditation of laboratories, inspection bodies, reference material producers, and any other relevant areas
- The recognition of a laboratory, inspection body and/or reference material producer as equivalent to an ACLASS accredited customer
- Accept endorsed calibration/test/inspection reports of MRA/MLA signatories
- Promote the acceptance of international MRA/MLA
- Investigate complaints
- Contribute to the appropriate MRA/MLA Councils
- Provide other available resources as determined by ACLASS

30.0 USE OF ACLASS DOCUMENTS AND GUIDANCE DOCUMENTS

ACLASS encourages its assessors, experts, staff, and customers to use guidance documents that are publicly available and/or published by ACLASS. Many organizations, including ACLASS, publish guidance documents covering specific technical areas of calibration, testing, inspection, proficiency testing providers and reference material producers. Other guidance documents exist to help in calculating measurement uncertainties or help in determining the proper expression of SI units.

ACLASS has made several guidance documents available on its website for use by any interested party and encourages all assessors, experts, staff and customers to review any relevant guidance documents. Because of space limitations on the ACLASS website, the guidance documents available on the website do not represent all guidance documents available from ACLASS, rather only a sample.

ACLASS maintains a database of public guidance documents and are available to any interested party upon request.

ACLASS Documents, 3, 4, 5 and 6 are mandatory for all applicant and accredited customers, as applicable.

ACLASS Documents 1, 2 and ACLASS Guidance documents apply to all applicant and accredited customers, where relevant.

Mandatory documents for all applicant and accredited customers will be indicated within each specific document, where relevant.

31.0 CROSS FRONTIER ACCREDITATION

ACLASS shall take into account ILAC G21 Cross Frontier Accreditation – Principles for Avoiding Duplication, if asked to provide accreditation to an organization outside its country or economy.

When taking into account ILAC G21, ACLASS shall ensure it does not violate the requirements found in ISO/IEC 17011 and agreed to and signed obligations of WTO members. ACLASS shall also ensure, when taking into account ILAC G21, ACLASS is not in violation of federal statutes of The United States of America and state statutes of the State of Virginia and the State of Wisconsin that would cause ACLASS to conduct or appear to conduct activities that could be and/or are considered illegal activities that would cause ACLASS and ACLASS' customers irreparable harm.

When taking into account ILAC G21, ACLASS may consider but not limited to:⁴³

- Inquire whether the applicant is aware of the local accreditation body/bodies
- Suggest that the accreditation could be more economically performed by a local body
- Point out the equivalence of the local accreditation demonstrated through the ILAC Arrangement
- Suggest a joint accreditation and/or observation by the local accreditation body
- Consider the eventual handover of the accreditation to the relevant local accreditation body

32.0 DELAYS WITH ASSESSMENTS

During the course of most ACLASS assessment visits, there are findings (i.e. non-conformances) written. These highlight either minor or major deficiencies found in the system being assessed. At the closing meeting of each visit, these findings are reviewed, and the anticipated timeframe of closure of the findings is also reviewed. Whenever findings are written related to an assessment visit, the affected organization is notified of the expectation for them to reply to ACLASS within 30 days of the closing meeting specifically to each finding. At a minimum, this response should outline the steps to be taken to close out the finding. If possible, the response may also include sufficient evidence of corrective actions and documents or records that will allow this closure. If the objective evidence submitted is not enough for closure, it should at least outline the plan and timeframe for closure.

There are times, however, when organizations are delayed in their corrective action responses. Such delays could have a negative affect on the relevant organization's accreditation process.

If an applicant customer, during initial accreditation, fails to respond meaningfully to all non-conformances in writing within six months after the date of the closing meeting (i.e. last day

⁴³ When taking into account ILAC G21, ACLASS shall ensure its activities do not violate state and/or federal laws.

of the initial accreditation assessment), ACLASS may require the customer to submit a new application, subject to new fees, and undergo a full reassessment.

If an applicant customer responds formally to the non-conformances within 6 months, but fails to have all relevant non-conformances closed by ACLASS as a result of their reasonable and appropriate corrective actions within one year, they may be required to undergo a full reassessment. ACLASS reserves the right to require a reassessment of an organization before an initial accreditation decision is made based on timeliness of corrective actions, the seriousness of the non-conformances written and appropriateness of the corrective actions.

Organizations undergoing surveillance or reassessments are required to respond to all non-conformances in writing within 30 days after the date of the closing meeting. Failure to resolve all non-conformances within 60 days (unless another timeframe has been agreed to by ACLASS) from the date of the closing meeting may result in the suspension and/or withdrawal of accreditation for that organization.


Organizations submitting an application for accreditation to ACLASS and where no activity has occurred for a period of one year may be required to submit a new application and subject to a new application fee.

DISTRIBUTION AND APPROVAL

Distribute to:

Main File

Approvals:


/s/
Vice President

Supplemental Information for FCC

Dr. Brian Lee

Mr. Lee's has more than 15 years experience with FCC regulations, which includes Parts 2, 15, 18, and 68. Mr. Lee's extensive experience started from the time when the U.S. and Taiwan governments began seeking mutual recognition in regard with certification of medical devices and electronic equipments. Mr. Lee played a key role in the set-up of the Taiwan product testing laboratories. During this time, the Taiwan national metrology and testing labs were planning to open ten sites for product testing. Mr. Lee maintained a technical exchange and visited with FCC staff during this time, Mr. Art Wall. During these exchanges and the subsequent set-up of the Taiwanese laboratories by Mr. Lee, Mr. Lee gained years of experience with FCC regulations (including Parts 15, 18, 68, and 2), and the implementation for the Taiwan industries.

- Vice Chair of the CNLA electrical testing field including EMC
- Lecturer of the 1995 EMC Testing and Calibration and Future Trends Workshop-FCC/NVLAP Regulations (FCC Part 15, 18, 68) and EU EMC Directive
- Voting Members for Several IEEE standards, e.g., 1528, 1309
- Perform accreditation assessments to the IEC standards.
- Assist local labs on EMI uncertainty analysis
- Familiar with the usage and design of microwave and RF testing equipments, such as spectrum analyzers

Mr. Stephen Berger

Mr. Berger has been an EMC engineer for 28 years and has extensive experience in FCC Parts 2, 15 and 18. He has extensive experience in developing EMC standards and chaired the committees for ANSI C63.4 and C63.17, both of which are used as the test methods portions of FCC Part 15. He is also president of INARTE (International Association of Radio, Telecommunications and Electromagnetic Engineers) which certifies EMC engineers.

His work experience includes 5 years supervising Datapoint's EMC laboratory, testing information technology equipment, 10 years with Siemens, supervising their lab testing telecommunications equipment and 9 years as a consultant, assisting a variety of clients with their regulatory compliance. All of which included experience with FCC regulations.



**Supplemental Requirements to ISO/IEC 17025 for
Electromagnetic Compatibility Testing Program &
CAB Designation under the APEC Tel MRA**

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1.0 PURPOSE

The purpose of this document is to establish additional policies for and provide a supplement to the ACLASS ISO/IEC 17025 accreditation program for conformity assessment bodies as testing laboratories under electromagnetic compatibility testing (EMC) in order to meet FCC regulations and/or the foreign EMC/telecom technical requirements for conformity assessment body (CAB) designation under the APEC Tel MRA. This document is available to the general public and any interested party, and is written specifically to supplement the ACLASS ISO/IEC 17025 accreditation program for conformity assessment bodies.¹

The term “customer” as used in this document refers to an organization seeking accreditation from ACLASS. An ACLASS customer shall maintain impartiality and integrity.

The term “EMC” is the abbreviation used to refer to electromagnetic compatibility testing.

2.0 INTRODUCTION

ACLASS is committed to superior accreditation services including those for conformity assessment bodies of telecommunications equipment following the FCC Accredited Test Laboratory Technical Assessment Evaluation Checklist (or future versions thereof) in combination with ISO/IEC 17025 and/or those seeking accreditation to the foreign technical requirements under applicable government to government MRAs such as Phase I of the APEC Tel MRA.² Our processes for such accreditation offer applicant bodies the opportunity to assure their customers of their compliance with international standards, compliance of equipment subject to the FCC EMC Regulations contained in 47 CFR Parts 2, 15, and 18, requirements for EMC and telecom products under specific APEC Tel Phase I economies, and international recognition of good practices.³

ACLASS will maintain impartiality as required by ISO/IEC TR 17010 (see also Responsibilities and Obligations of the Customer, Appendix A of the ACLASS application for accreditation).

3.0 CONFORMITY ASSESSMENT OF TELECOMMUNICATIONS EQUIPMENT⁴

The purpose of an MRA for Conformity Assessment of Telecommunications Equipment is to facilitate trade by allowing Conformity Assessment Bodies (CABs) in one country

¹ Throughout this entire document, additional information about the ACLASS accreditation process can also be found in ACLASS Document 3, ISO/IEC 17025 Accreditation Requirements. This document is available on the ACLASS web site at www.aiclasscorp.com.

² In addition to using the ACLASS ISO/IEC 17025 checklist, assessments also involve the use of the FCC Accredited Test Laboratory Technical Assessment Evaluation Checklist as found at www.fcc.gov/oet/ea/mra and ACLASS Form 31.

³ Requirements for APEC Tel Phase I economies can be found at http://ts.nist.gov/Standards/Conformity/mra/how_to_apply.cfm

⁴ The following is an excerpt from the Federal Communications Commission at www.fcc.gov/oet/ea/mra

to test and/or certify products to the technical standards of another country. For APEC and CITEC countries participation is voluntary; however, if a country agrees to participate certain rights and obligations apply. Once an MRA for Conformity Assessment of Telecommunications Equipment is in place the United States implements the MRA by exchanging letters with the participating country, which identify the responsible parties and their obligations. The exchange letters also identify the scope (acceptance of test reports and/or equipment approval) of the MRA.

Mutual Recognition Agreements (or arrangements) (MRAs) are government-to-government trade facilitating measures aimed at a global approach to conformity assessment.⁵ The government-to-government agreements can be multi-sector, as in the U.S.-EU MRA, covering more than one group of products. The agreements can also be multi-lateral, as in the APEC MRA, providing a guideline for all member economies (countries) to follow. In each of the agreements, participating countries agree to accept the test results and/or product approvals performed by the Conformity Assessment Bodies (CABs) of the other country based on the use of a set of internationally accepted procedures. The present MRAs only address the issue of harmonizing conformity assessment procedures and do not attempt to harmonize regulatory standards or technical standards. These agreements were initiated and supported by the U.S. industry to allow for the acceptance of each others conformity assessment procedures. An objective in implementing MRAs is to ease the burden on manufacturers and reduce their costs and time to market for products by implementing transparent conformity assessment processes that are similar within multiple countries while ensuring that products that reach the market are compliant.

3.1 Conformity Assessment Body

Within the text of the Mutual Recognition Agreements (MRAs) the term Conformity Assessment Body (CAB) was developed to identify the organizations performing conformity assessment. A Conformity Assessment Body is a body which may include a third party or a supplier's testing laboratory, or a certification body, that is designated to perform conformity assessment to an importing Party's Technical Regulations under this Arrangement.

Under the FCC's Equipment Authorization Program there are two types of Conformity Assessment Bodies:

- Accredited testing laboratories are used to perform testing of equipment subject to requirements that permit the use of a Declaration of Conformity to demonstrate compliance.).
- Telecommunication Certification Body (TCB) is used to perform third-party certification of equipment subject to the FCC requirements that require the product to be certified.

⁵ These agreements should not be confused with the Mutual Recognition Arrangements between accrediting organizations.

3.2 CAB Designation under the APEC Tel MRA

Our program includes the appropriate EMC/telecom testing requirements, which may also include product safety testing standards, of foreign regulatory authorities covered under the government-to-government MRAs. An example of these types of requirements for EMC and telecom products can be found under the specific APEC Tel Phase I economies at the following link:

http://ts.nist.gov/Standards/Conformity/mra/how_to_apply.cfm

3.2.1 How to Apply for NIST CAB Designation

The National Institute of Standards and Technology (NIST) is the Designating Authority for CAB designations in the United States.

In order to apply for Phase-I CAB designation, please follow the steps noted at this website: http://ts.nist.gov/Standards/Conformity/mra/how_to_apply.cfm. In case an organization is seeking CAB designations at multiple locations, apply for each location separately. Before applying, have your laboratory accredited by an accreditation body that is acceptable to NIST for standards/test methods of APEC economy of interest. Once NIST has reviewed the application and confirmed its completeness, NIST will forward a designation request to the economies in question. Under the terms of the MRA, economies have up to 60 days to respond to NIST. There are currently no NIST fees associated with designation requests and recognition.

3.3 FCC Participation in MRAs

The Federal Communications Commission (FCC) participates in several MRAs. Access to these MRAs can be found by visiting the following website:

<http://www.fcc.gov/oct/ea/mra/>.

3.3.1 FCC Implementation of MRAs

The Federal Communications Commission implements the MRA in accordance with policies found by visiting <http://www.fcc.gov/oct/ea/mra/>.

3.3.2 Scope and Measurement Techniques

The scope includes all equipment subject to telecommunication regulations, including wire-line and wireless equipment. For such equipment, the MRA covers electromagnetic compatibility (EMC) and telecommunications aspects of the conformity.

The FCC maintains a series of documents that are a non-exclusive list of measurement techniques that may be used when testing equipment to determine its compliance with FCC rules. This list can be accessed by visiting the following link: <http://www.fcc.gov/oct/ea/measurements.html>. This list is provided as a reference tool to aid interested parties in locating measurement techniques. Any party making

measurements to show compliance with the FCC rules should select the appropriate measurement methods as required and specified in the particular part of the FCC rules. (For example, for Part 15 devices see §§15.31, 15.32, 15.33, and 15.35 of title 47 of the Code of Federal Regulations (C.F.R.)). The FCC Knowledge Database found at <https://fjallfoss.fcc.gov/oetcf/kdb/index.cfm> provides additional guidance on testing devices subject to the FCC's rules.

4.0 ACCREDITATION PROCESS

4.1 Quotation and Charges

A customer can request and obtain a quotation from ACLASS. Any Authorized ACLASS personnel can provide a quotation. Information on the number of assessment days and rates for ACLASS services are readily available. ACLASS will charge the customer for the accreditation services on the basis of the time spent and the number of the types of tests as stated in ACLASS' then current fee schedule, which is publicly available upon request. More information related to quotation and charges, including cancellation fees, corrective action review, assessor travel time, etc. can be found in ACLASS Document 3, located on the ACLASS web site at www.aiclasscorp.com.

4.2 Application

ACLASS will provide accreditation services to any customer who applies and if ACLASS has or can reasonably obtain the proper credentials and resources.

An application form is provided with each quotation. Every customer seeking accreditation must submit an application packet. This packet should be submitted in electronic format, when possible, and must include the following:

- A completed application form (include all relevant locations to be covered by the accreditation)
- Quality Manual
- Standard operating procedures and work instructions
- Completed draft scope of accreditation to include the following:
 - Identify the type/class of testing
 - Identify the specific tests or properties measured
 - Identify the specifications, standard method or techniques used
 - Where appropriate, identify the detection limit, range, or equipment used

ACLASS accreditation activities shall be confined to the attached scope provided with the application.

Upon receipt of the completed application packet (signed by the customer's Authorized Representative) and fee, ACLASS will review the application to make sure it has all the information needed, as well as to make sure ACLASS has the proper accreditation credentials and resources. During the review of the application packet, ACLASS will assign

a lead assessor. The customer will be informed of the assigned assessor(s). The customer has the right to appeal (object) the assigned assessor(s) and/or expert(s) (see also this document, Section 4.2.1).

After final review of the completed application form, ACLASS will acknowledge to the customer receipt of the application and ensure that all customer expectations can be met, particularly the customer's desired scheduling. Customer and ACLASS shall work in coordination with each other to determine assessment dates.

4.2.1 Notification and Objections

ACLASS will inform the customer in advance of performance of any service as to the names of all assessors and/or experts assigned to its accreditation process. The customer may decline (object) to ACLASS to have any particular assessor(s) and/or expert(s) work on their accreditation process. This is especially true and expected if the customer knows of any existing or potential conflicts of interest. ACLASS will inquire as to the reason for such objection.

If the customer objects to the appointment of any particular assessor and/or expert they shall:

- Submit their objection in writing to ACLASS
- Identify the particular assessor(s) and/or expert(s) in question
- Identify the reason(s) behind the objection including known conflict of interests
- Sign the letter of objection by a duly authorized representative of the organization

Upon receipt of the signed letter of objection, ACLASS shall:

- Determine the objection to be valid
- Investigate the cause for the objection, including taking any necessary corrective and/or preventive actions
- Appoint new assessor(s) and/or expert(s)
- Notify the customer in writing the names of the new member(s) of the assessment team

4.3 Introductory Visits/Practice Assessments

Both introductory visits and practice assessments are available to applicant customers. The purpose of an introductory visit is to convey the ACLASS accreditation process and requirements to the customer. ACLASS will not give any advice nor consult in any manner.

The practice assessment consists of an assessment in the same manner as an actual accreditation assessment and will document compliance and non-conformities on the same forms as in an actual assessment. The practice assessment has no influence on the

actual accreditation assessment and assessor(s) assigned to perform the practice assessment normally will not perform the accreditation assessment.⁶

4.4 Document Review

Upon receipt of the application packet containing the required documentation under section 3.2 above, ACLASS will conduct a document review. ACLASS will perform an evaluation to begin the determination of conformance of the customer's ISO/IEC 17025 management system to the requirements. The customer must have a documented ISO/IEC 17025 management system which conforms to the requirements. ACLASS may ask the customer for additional documentation and information during the document review process.

ACLASS will deliver to the customer a document review report indicating which requirements are adequately addressed and a summary of any issues. If significant issues arise from the document review, ACLASS may recommend to the customer the option of a planning visit to ensure readiness for the accreditation assessment.

For all reassessments, a formal document review shall also be conducted and documented.

4.5 Planning Visit

A planning visit may be requested by the customer at any time. An assessor will normally perform a one day visit to the customer to review resolution of any issues from the document review, and to verify that other documentation exists supporting the ISO/IEC 17025 management system. The assessor will also perform sample assessment questioning. This allows the assessor to judge if the customer is ready for the accreditation assessment. Also, this visit and review enables the assessor to prepare the plan and schedule for the assessment.

4.6 Assessment Preparation

Before all assessments, the assessor shall review all appropriate management system documentation to determine compliance with ACLASS requirements, including the requirements of the FCC Accredited Test Laboratory Technical Assessment Evaluation Checklist, requirements for EMC and telecom products under the specific APEC Tel Phase 1 economies, and/or other requirements that have been or may have been added to this program.

During this review, the assessor and/or assessment team may request additional documentation from the laboratory. This includes but is not limited to, relevant test method(s), standard operating procedures (i.e. test procedures). If requested, the laboratory shall provide the requested information.

⁶ For more information see also ACLASS Document 3. ISO/IEC 17025 Accreditation System for Customers.

The advance planning for all assessments shall consist of:

- Thorough documentation review
- Review of the scope of accreditation
- Selection of critical tests that must be witnessed at the upcoming visit
- Advance communication with the laboratory to help plan the assessment schedule
- Finalizing the schedule / agenda for the assessment visit

4.7 Accreditation Assessment

The purpose of the accreditation assessment is to sample the customer's quality and technical management system in the area(s) of electromagnetic compatibility testing and determine through the use of interviews, reviewing procedures, data, and records, plus witnessing selected procedures or technical methods that the customer's system is effectively implemented and meets the applicable requirement(s).⁷ The assessment team uses the accreditation assessment to judge if the customer is ready to be accredited.

The accreditation assessment shall consist of:

- thorough review of customer's compliance to the requirements for accreditation including use of the FCC Accredited Test Laboratory Technical Assessment Evaluation Checklist
- an opening meeting with the customer's management
- staff interviews to ensure proper training and technical competence
- daily assessor meetings and customer debriefings
- a review of any open issues from the document review and planning visit, if applicable
- on-site assessment to determine compliance and to evaluate expertise in the area(s) applied for
- Assessors will sample and witness a sufficient number of test methods across technologies within the scope of accreditation. They shall ensure enough notice is provided to the laboratory in order for the laboratory to schedule the variety of tests with an artifact or sample under test, whenever possible.⁸
- a final assessment team meeting to discuss findings
- a recommendation from the lead assessor in consultation with the assessment team to accredit, not to accredit, or hold accreditation pending non-conformance resolution
- a closing meeting

The customer will receive a detailed Accreditation Assessment Report. This report contains information about the customer, details about the accreditation and scope,

⁷ Some economies include product safety testing standards

⁸ Such tests may include normalized site attenuation, product safety tests, MIL-STD-462, antenna pattern tests, C63-17 among others.

identification and information about the assessors, a summary of the assessment results, and copies of each finding. The report will also include copies of the assessors' Accreditation Checklist and notes.

ACLASS may provide guidance to the lead assessor as requested and as needed.

4.7.1 Witnessing Scope of Accreditation

As a result of the large number of test methods and applicable standards within the EMC/telecom/electrical community, the assessor and/or assessment team utilizes the "scope/method assessment review" sheets in conjunction with the applicable checklists to review the laboratory's conformance with test methods. This review consists of recording the extent to which the test was assessed by observing the test, interviewing personnel, reviewing procedures, reviewing and inspecting equipment, and assessing on-site tests. At a minimum, the assessor and/or assessment team must ensure the laboratory has equipment, method, and trained personnel to perform each test on the proposed scope of accreditation.

ACLASS assessors verify the competency of laboratories to conduct various types and/or groups of test on the scope of accreditation by using a variety of sampling methods including but not limited to, sampling across technologies, sampling high risk methods, sampling those tests done more frequently and those done rarely.

Demonstrations of specific test procedures will include at a minimum discussions with personnel conducting the tests, preparation of the test item, test conditions, and use of major equipment. The "scope/method assessment review" sheet is used to document this examination.

All equipment necessary to conduct testing related to the scope of accreditation shall be available during each assessment. The assessor and/or assessment team shall examine the equipment, accommodation and environmental conditions.

4.7.2 Non-Conformances

The assessment team shall record findings on ACLASS' Non-Conformance Record traceable to the ACLASS ISO/IEC 17025 Accreditation Checklist and the FCC Accredited Test Laboratory Technical Assessment Evaluation Checklist. Team members will classify each finding as a major non-conformance or a minor non-conformance and note each one on the respective location in the checklist.

A Major Non-conformance is the absence of, or the failure to implement and maintain one or more of the Accreditation Checklist requirements, or a situation which would, on the basis of available objective evidence raise significant doubt as to the activities conducted by the accreditation customer. The assessment team may judge numerous minor non-conformities against a single requirement to be a significant breakdown of the management system and thus a major non-conformance.

A Minor Non-conformance is any other non-conformance which is an isolated occurrence and is normally easily corrected and verified.

An Opportunity is neither a major nor minor non-conformance. It is used to document items that may help a customer improve their quality or technical systems.⁹

If during the initial accreditation assessment a significant number of non-conformances are identified and these non-conformances affect considerably the completion of the assessment, the lead assessor may, in coordination with ACLASS, recommend to the customer that the initial accreditation assessment be considered a practice assessment. If such a case, the initial accreditation assessment will then be re-scheduled.

4.8 Customer Corrective Actions

During the accreditation process, surveillance and reassessment, ACLASS assessors will identify issues and non-conformities. The customer and ACLASS will agree upon the deadline (normally 30 days) for corrective actions.¹⁰ ACLASS reserves the right to verify whether the customer has taken and effectively implemented adequate corrective action. Responses shall be sent to ACLASS for distribution to the lead assessor.

ACLASS requires the customer to take prompt actions on any issues or problems identified by the customer during internal audits or reviews as well as to ACLASS assessments.

Based on the recommendation of the assessment team, results of the assessment and extensive corrective actions a possible follow-up visit may be required. The amount of time to perform this service will depend on the severity of the situation. The charge for this service will be at ACLASS' current rate. The timing for this part of the assessment process will be coordinated between ACLASS, the lead assessor and with the customer.

4.9 Decision on Accreditation

The lead assessor will present the recommendation and assessment reports to ACLASS. The content and format of the assessment report will be in accordance with ACLASS' procedures. There will be a one time charge for the processing of the accreditation decision and assessment report.

Upon receipt of the accreditation reports and resolution of non-conformances, ACLASS shall establish the Accreditation Review Panel. The purpose of the panel is to review the

⁹ ILAC-G20:2002 Guidelines on Grading of Non-conformities is used as guidance for classification of non-conformances

¹⁰ For surveillance and reassessments, ACLASS requires corrective action responses within 30 days from the date of the assessment.

customer's accreditation reports for compliance to the ACLASS requirements for accreditation.¹¹

If the accreditation decision is favorable and when all payments have been received, ACLASS will grant accreditation and will issue a certificate and scope of accreditation. A description of the accreditation and a reference to the scope will be shown on the certificate.

The date upon when the accreditation decision was made shall be the valid date of accreditation for each customer. The accreditation decision date shall determine the annual surveillance and reassessment cycle.

If an accreditation decision is unfavorable or if a customer has withdrawn its application, ACLASS will consider any new application only after the customer has demonstrated that adequate corrective actions have been taken on those points on which the earlier accreditation had been denied, or that the reasons for the withdrawal no longer apply.

4.10 Surveillance Assessment

ACCLASS accreditation is for two years. After the initial year of accreditation, each customer shall undergo, at a minimum, a one-day surveillance assessment. The purpose of the surveillance is to ensure that the customer's organizational management system is maintained and remains effective.

At a minimum, complaints, internal audits, management reviews and any changes to key personnel or facilities are elements of the customer's management system which ACLASS will review during each surveillance visit.

ACCLASS may conduct surveillance assessments on a more frequent occurrence should ACLASS determine surveillance is warranted.

Any resulting non-conformance from a surveillance visit shall be responded to by the customer within 30 days. Responses shall be sent to ACLASS for distribution to the lead assessor. ACLASS shall monitor this time limit, and take any appropriate action. Such appropriate action may include suspension or withdrawal of accreditation in accordance with ACLASS procedures and the application for accreditation.

If the results of the surveillance visit yield excessive non-conformities or if major modifications occur, ACLASS may require a follow-up visit and/or additional assessment time.

4.11 Reassessment

¹¹ For more information on the Accreditation Review Panel see ACLASS Document 3 available at www.aiclass.com

ACCLASS will conduct a formal document review (see also section 4.4) and full on-site reassessment of accredited customers at least once every two years for verification of continued compliance with ACLASS' accreditation requirements. The reassessment process is similar to the accreditation assessment (see also section 4.6).

Any resulting non-conformance from a reassessment visit shall be responded to by the customer within 30 days. Responses shall be sent to ACLASS for distribution to the lead assessor. ACLASS shall monitor this time limit, and take any appropriate action. Such appropriate action may include suspension or withdrawal of accreditation in accordance with ACLASS procedures and the application for accreditation.

If the results of the reassessment visit yield excessive non-conformities or if major modifications occur, ACLASS may require a follow-up visit and/or additional assessment time.

5.0 APPEALS

The ACLASS appeal process has two levels: Level 1 appeals are heard by a panel of ACLASS staff and/or assessors; level 2 by a panel of the Accreditation Council.

Level 1 appeals are heard by a panel of three consisting of staff and/or accreditation assessors not involved in the assessment. This is normally the level applied to any appeal of an assessment nonconformance.

Level 2 appeals are made to the Accreditation Council and heard by a panel of three members of the Council. This is the first level for any appeal of an accreditation decision or any other decision of the Accreditation Council. It is also the second level of appeal if either party (the appellant or ACLASS) is not satisfied with the decision made by the level 1 appeal panel.

An appeal shall be lodged in writing no later than 30 days after notification to the customer of the decision or action, or whenever the appropriate appeal panel may reasonably assume the decision or measure in question to be known to the appellant.

Appeals shall be lodged using the appeals form (Form 18) and is to include appropriate substantiation for the appellant's position.¹²

A panel of three members is appointed, with one of the three members appointed chair. For level 1, the panel members are appointed by the ACLASS Vice President and/or Senior Accreditation Manager. For level 2, the panel members are appointed by the chair of the Accreditation Council. The appellant and ACLASS shall be informed of the members of the panel and have an opportunity to object to the selection(s).

¹² An appeals form is available on the ACLASS web site at www.aiclasscorn.com